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FMPC RI/EIS, COMMENTS FROM THE DEPARTMENT OF THE INTERIOR

06/18/1990

**US DEPT OF INTERIOR DOE
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LETTER**



United States Department of the Interior

FISH AND WILDLIFE SERVICE

MADE
IN
AMERICA

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IN REPLY REFER TO:

Reynoldsburg Field Office
6950-H Americana Parkway
Reynoldsburg, Ohio 43068-4115
(614) 469-6923

June 18, 1990

Bobby Davis, Environmental Manager
U. S. Department of Energy
P. O. Box 398705
Cincinnati, Ohio 45239-8705

Attn: FMPC RI/FS-EIS, ER 90/469

Dear M. Davis:

This responds to the Federal Register Notice regarding the proposed RI/FS-EIS for the Feed Materials Production Center near Fernald, Ohio dated May 15, 1990 (Vol. 55, No. 94, page 20183). We would be willing to become a cooperating agency in this project if you think it would enhance project quality. Our participation would have to be limited to review and comment of project documents unless there were a transfer of funds for specific activities. In any case we remain interested in the Fernald plant because of the potential that damages to fish and wildlife resources may have resulted from its activities.

We would like to make the following comments regarding scoping for the RI/FS-EIS:

1. Contractors retained to develop the RI/FS-EIS should be made to show that they have assigned personnel to the project who are fully qualified to interpret the biological and ecological effects of contamination by radionuclides. This means that there needs to be at least one biologist or ecologist on the RI/FS-EIS team. This expertise should be at the PhD level with experience.
2. The RI/FS-EIS should describe the vegetation on site and in surrounding areas subject to site releases and include a map of this vegetation. Elements to be considered should include forested areas (include major species and size), various wetland types (describe using the system of Cowardin et al titled "Classification of Wetlands and Deepwater Habitats of the United States"), grassland, old field, cropland, and aquatic vegetation.
3. The RI/FS-EIS should describe Fernald site releases using the mass balance approach. The fate of these materials in the environment should be detailed. The specific activity of various media in contaminated areas should be presented along with the types of radiation emitted (alpha, beta, and gamma).

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4. Site and vicinity fish and wildlife should be sampled and appropriate tissues examined for radionuclides. Vegetation and surface soils should also be analyzed for radionuclides.
5. The movement of radionuclides released from the Fernald site in aquatic and terrestrial ecosystems should be modeled and any points of concentration should be noted, e.g. particular species or tissues. The behavior of birds, such as dusting and eating grit, should be discussed relative to their exposure to radionuclides. The radionuclides in vegetation should be discussed relative to their herbivores. The radionuclides in herbivores should be discussed relative to their carnivores.
6. The risk assessment should consider not only human health but the risk to fish and wildlife species themselves.

If you have any questions or we may be of further assistance please contact Mr. Bill Kurey of this office at 614/469-6923.

Sincerely,

Kent E. Kroonemeyer
for Kent E. Kroonemeyer
Supervisor

cc: Ohio Division of Wildlife, (John Marshall), Columbus, OH
ODNR, Outdoor Recreation Service, Attn: M. Colvin, Columbus, OH
Ohio EPA, SW Dist., 40 S. Main St., Dayton, OH 45402
REO, FWS, (Shelia Huff), Chicago, IL
BFA (ERT), Washington, DC
FWS, R3, (Lynn Lewis), Twin Cities, MN